



ConwayCourt
—Reporting—

Transcript of the Testimony of
WARDEN STEPHEN ARNOLD

Date: NOVEMBER 15, 2018

**Re: SHIPP VS. CORRECT CARE SOLUTIONS, LLC, ET
AL**

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1 Q Okay. So you don't know -- you don't have any testimony
2 as far as whether that was done or not?
3 A No.
4 Q And you --
5 A The only testimony I have is that the resident would have
6 been told he needed to see Medical.
7 Q And that's from your handwriting there?
8 A That's correct.
9 Q And you called them "special shoes"; right?
10 A "If you need special shoes, you will need to see Medical."
11 Q Why do you call them "special shoes"?
12 A Because that's what he says.
13 Q Okay. He calls them "orthotics"; right?
14 A Okay. And I'm -- obviously, based on my verbiage, I'm not
15 a medical person. That's why I sent it to Medical.
16 Q Do you have any family members who have had diabetes?
17 A Yes. My father has diabetes.
18 Q When was he first diagnosed with diabetes?
19 A Oh, probably ten years ago.
20 Q Does he have concerns about his feet or joints related to
21 his feet?
22 A My father is in a facility, and he is in bad health, and I
23 really don't think that's important to what we're talking about
24 here.
25 Q Well, prior to February of 2016, did your father have any

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1 A I referred him to the medical staff, because I'm not a
2 doctor or a practitioner; I'm an administrator.
3 Q Do you know why Medical was telling him to send requests
4 to you?
5 A I have no idea why Medical was telling him to send
6 requests to me. It's clearly a medical condition.
7 Q It's a serious medical condition, isn't it?
8 A It's clearly a medical issue, and it was referred to
9 Medical.
10 Q Is something that can result in an amputation of a foot a
11 serious medical condition?
12 A I think, obviously, that's true.
13 Q And so I want to know, who did you speak with in Medical
14 after this request was sent to you?
15 A I am sure I would have talked to Ms. Turner.
16 Q Okay. So you talked to Ms. Turner on February 1st or
17 February 2nd --
18 A I can't tell you what date I talked to her. I'm sure I
19 would have talked to Ms. Turner.
20 Q Well, do you know -- if you're saying you're sure you
21 would have, would you have done it on the 1st, 2nd, or 3rd?
22 A I can't tell you.
23 Q Would you have waited a week?
24 A I wouldn't think so, no.
25 Q Would you have waited two weeks?

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1 issues with his feet related to his diabetic condition?
2 MS. MIDDLETON: I will object on relevance.
3 Q Can you answer?
4 A I don't want to answer. My father didn't have anything to
5 do with this case.
6 Q Does your knowledge of someone with diabetes affect your
7 decision-making in medical decisions?
8 A I don't think so.
9 Q So you don't care what someone's medical conditions are,
10 do you?
11 A No, I'm not saying that at all. That's what you said.
12 That's not what I said. I want to make sure that's clear. I
13 did not say that.
14 Q On February of 2016, were you aware that someone with
15 diabetes could have issues with their feet?
16 A I sent -- this guy's request every time went to the
17 medical staff. We had medical staff onboard. I did my due
18 diligence by getting that person to the medical staff.
19 Q And what did you do beyond writing that response to make
20 sure he saw the medical staff?
21 A I think there's clear --
22 Q I'm talking about --
23 A -- in the documents we've looked at, there's clear
24 follow-through that he was seen by the medical staff.
25 Q And I'm talking about what you did.

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1 A Of course not.
2 Q Did you normally communicate with Ms. Turner through
3 emails or in person?
4 A Sometimes emails; sometimes in person. Ms. Turner -- we
5 invited Ms. Turner to our management team meetings as a part of
6 that, so we communicated a lot. Sometimes were about medical
7 issues, and sometimes weren't. Sometimes we just communicated
8 throughout the facility. I did a lot of walking when I was at
9 that facility.
10 Q Did you ever speak with Mr. Shipp?
11 A I'm sure I did.
12 Q Do you remember him asking you about your -- about his
13 orthotic shoes?
14 A I would not be surprised that he did. I was on those
15 floors every day most days all day. I would go on those floors
16 at 6:00 in the morning, and I would leave there at 10:00 at
17 night, so I'm sure I would have had a conversation with Mr.
18 Shipp.
19 Q What would your response have been to him if he asked you
20 about his orthotic shoes?
21 A I would probably guess that he would have to see Medical,
22 that I wasn't a doctor.
23 Q And so February 1st, 2016, is Mr. Shipp's first day there.
24 A Okay.
25 Q Do you have any -- do you agree with that?